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SDMS Document



93344



March 31, 2004

VIA FEDERAL EXPRESS

Elizabeth Butler, Remedial Project Manager
Emergency and Remedial Response Division
U. S. Environmental Protection Agency
290 Broadway – 19th Floor
New York, New York 10007-1866

RE: **LOWER PASSAIC RIVER STUDY AREA**
REQUEST FOR INFORMATION PURSUANT TO 42 U.S.C. §§ 9601-9675

Dear Ms. Butler:

The 104(e) RFI response attached as **Exhibit A** to this letter is timely submitted on behalf of Texaco Inc. ("Texaco"), within the March 31, 2004 deadline extension granted by Ms. Kedari Reddy and left on my voicemail on March 15, 2004. Texaco has diligently conducted a search of its files and its response is based upon this search. However, given the extremely broad historic timeframe covered by the 104(e) RFI, Texaco considers the relatively limited amount of time given by EPA to respond to such a broad RFI as not being reasonable notice, which is clearly a requirement under section 104(e) of CERCLA. The answers contained in Exhibit A represent Texaco's good faith efforts to satisfy a broad and complex series of questions in a very short period of time.

Before responding to each particular question in turn, Texaco objects generally to the Request as being beyond USEPA's authority to the extent that it seeks information not specified as subject to production under CERCLA. Specifically, CERCLA Section 104(e) only authorized access to information relevant to the *identification, nature and quantity of materials* which have been or are generated, treated, stored or disposed of at or transported to a facility; *the nature of extent of a release* or threatened release of a hazardous substance at or from the facility; or information relating to the Respondent's *ability to pay or perform a cleanup*. See 42 U.S.C. § 9604(e)(2)(A)-(C).

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Notwithstanding this objection, and without waiving the right to raise and litigate such issue at a later date, Texaco hereby provides the following answers to the questions set forth in the Request that, given the broad scope of the Request's questions, are within Texaco's best assessment of the proper scope of the Request. Texaco will produce under separate cover those documents not falling under the attorney-client privilege, attorney work product or other judicially recognized privilege that are responsive to the 104(e) RFI. Texaco's search is ongoing and if Texaco discovers any further relevant non-privileged information during this process, it will be provided in a supplemental response.

Nothing contained herein or Exhibit A is intended to or should be construed as a waiver of any of Texaco's rights, entitlements or defenses. Further, nothing herein or Exhibit A is intended to be an admission against Texaco's interest as to any fact, liability, responsibility or issue of law.

You may contact me at the above-listed telephone number should you desire to further discuss this matter.

Sincerely,

A handwritten signature in black ink, consisting of a series of loops and a long horizontal stroke at the end.

B. Mark Hausman

BMH:lew

cc: Mr. Jon J. Baldwin
Kedari Reddy, Esquire

933440002

EXHIBIT A

TEXACO INC. RESPONSE TO EPA 104(E) REQUEST FOR INFORMATION REGARDING LOWER PASSAIC RIVER STUDY AREA

1) How long has your company operated at the facility? If your company no longer operates at this facility, during what years did your company operate at the facility?

Response: Texaco Inc. ("Texaco") objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objection stated above, to the extent that EPA meant to refer to the Getty Newark Terminal located at 86 Doremus Avenue in Newark, New Jersey ("Terminal"), Texaco responds that it does not currently own or operate the facility. Texaco acquired the facility on or about December 1984 when Texaco acquired Getty Oil Company. Texaco sold the facility to Power-Test Inc. on or about February 1, 1985.

2) a) Does your company have or has it in the past had a permit or permits issued pursuant to the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §6901 et seq.? If "yes", please provide the years that your company held such a permit and its EPA Identification Number.

Response: Texaco objects to the broad and unduly burdensome nature of this request, in that Texaco may have had multiple permits issued in the past under RCRA around the country for its various facilities. Without more specificity, it is unreasonable in scope and Texaco is unable to respond to this request. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco responds that it has not had any such permits.

b) Does your company have or has it in the past had a permit or permits issued pursuant to the Federal Water Pollution Control Act, 33 U.S.C. § 1251, et seq.? If "yes", please provide the years that your company held such a permit and its Identification Number.

Response: Texaco objects to the broad and unduly burdensome nature of this request, in that Texaco may have had multiple permits issued in the past under the Federal Water Pollution Control Act around the country for its various facilities. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco responds that to the best of its knowledge it has not had any such permits.

3) Did your company receive, utilize manufacture, discharge, release, store or dispose of any materials containing the following hazardous substances:

Response: Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without

waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco responds that to the best of its knowledge during its ownership of the Terminal it was used to store refined petroleum products including gasoline, kerosene, heating oil, diesel fuel and motor oil that likely contained the substances indicated below.

	Yes	No
2,3,7,8 tetrachlorodibenzo-p-dioxin	—	<u>x</u>
2,4-Dichlorophenoxy acetic acid (2,4-D)	—	<u>x</u>
2,4,5-Trichlorophenoxy acetic acid (2,4,5-T)	—	<u>x</u>
2,4,5-Trichlorophenol (2,4,5-TCP)	—	<u>x</u>
or other dioxin compounds	—	<u>x</u>
Dichlorodiphenyl-trichloroethane (DDT)	—	<u>x</u>
 Benzene	<u>x</u>	—
Ethylbenzene	<u>x</u>	—
Total Petroleum Hydrocarbons (TPEH)	<u>x</u>	—
Polyaromatic Hydrocarbons (PAH)	<u>x</u>	—
If "yes", please list specific compounds (contained in specified petroleum products)		
Toluene	<u>x</u>	—
Xylene	<u>x</u>	—
 PCBs	—	<u>x</u>
 Antimony	—	<u>x</u>
Argon	—	<u>x</u>
Arsenic	—	<u>x</u>
Cadmium	—	<u>x</u>
Chlorine	—	<u>x</u>
Chromium	—	<u>x</u>
Copper	—	<u>x</u>
Iron	—	<u>x</u>
Lead (in gasoline)	<u>x</u>	—
Mercury	—	<u>x</u>
Nickel	—	<u>x</u>
Silver	—	<u>x</u>
Sulfur	—	<u>x</u>
Titanium	—	<u>x</u>
Vanadium	—	<u>x</u>
Zinc	—	<u>x</u>
 Cyanide	—	<u>x</u>
 Acetone	—	<u>x</u>
Acetylene	—	<u>x</u>
Acetylene tetrabromide	—	<u>x</u>
2 butoxy ethanol	—	<u>x</u>
Bis (2-ethylhexyl) phthalate	—	<u>x</u>
Chlorodifluoromethane	—	<u>x</u>
Chloropentafluoromethane	—	<u>x</u>

Chlorotrifluoromethane	—	<u>X</u>
Dibutyl phthalate	—	<u>X</u>
Dichlorodifluoromethane	—	<u>X</u>
Naptha	—	<u>X</u>
Silver nitrate	—	<u>X</u>
Sodium bisulfide	—	<u>X</u>
Sodium hydroxide	—	<u>X</u>
Sodium nitrate	—	<u>X</u>
Tungsten	—	<u>X</u>

4) a) Provide a description of the manufacturing processes for which all hazardous substances, including, but not limited to, the substances listed in response to item (3), were a product or by-product.

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that at the time Texaco acquired Getty Oil Company, the Terminal was a storage and distribution terminal for refined petroleum products. Products were received via a pipeline system and by barge. Products were distributed via tanker trucks.

b) During what parts of the manufacturing processes identified in the response to items (4)(a), above, were hazardous substances, including, but not limited to, the substances listed in response to item (3), generated?

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that the petroleum products were not manufactured at the Terminal.

i) Describe the chemical composition of these hazardous substances.

Response: Not applicable.

ii) For each process, what amount of hazardous substances was generated per volume of finished product?

Response: Not applicable.

iii) Were these hazardous substances combined with wastes from other processes?

Response: Not applicable.

5) Describe the methods of collection, storage, treatment, and disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4).

Include information on the following:

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that the petroleum products were stored in eleven aboveground storage tanks ranging in storage capacity from 5,200 barrels to 54,000 barrels. Up to 13 underground storage tanks ranging from 275 gallons to 10,000 gallons were at one time in use for the storage of No. 2 fuel oil, gasoline additive, gasoline condensate, diesel fuel, waste truck motor oil, off-specification product (gas and fuel oil), and residuals from a loading rack.

a) Identify all persons who arranged for and managed the processing, treatment, storage and disposal of hazardous substances.

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it is unaware of any hazardous substances that were processed, treated or disposed of at the Terminal.

b) If hazardous substances were taken off-site by a hauler or transporter, provide the names and addresses of the waste haulers and the disposal site locations.

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it is unaware of any hazardous substances that were taken off-site from the Terminal.

c) Describe all storage practices employed by your company with respect to all hazardous substances from the time operations commenced until the present. Include all on-site and off-site storage activities.

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it is unaware of any hazardous substances that were stored on or off-site for the Terminal.

i) If drums were stored outside, were the drums stored on the ground or were they stored on areas that had been paved with asphalt or concrete? Please provide a complete description of these storage areas.

Response: Not applicable.

ii) When drums were stored outside, were empty drums segregated from full drums?

Response: Not applicable.

d) What processes do you use to treat your waste? What do you do with the waste after it is treated?

Response: Not applicable.

5) a) For process waste waters generated at the facility which contained any hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4):

i) Where was the waste water discharged and during what years?

Response: Texaco Inc. (“Texaco”) objects to EPA’s use of the term “facility” in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that this request is not applicable.

ii) Was the waste water discharged into a sanitary sewer and if so, during what years?

Response: Not applicable.

iii) Was the waste water treated before being discharged to the sanitary sewer and if so how? Please be specific.

Response: Not applicable.

iv) If the waste waters were not discharged to the sanitary sewer, where were they disposed and during what years?

Response: Not applicable.

v) Please provide the results of any analyses performed on any waste process streams generated at the facility.

Response: Not applicable.

b) For floor drains or other disposal drains at the facility:

i) Did the drains connect to a sanitary sewer and if so, during what years?

Response: Not applicable.

ii) If the floor drains or other disposal drains at the facility were not discharged to the sanitary sewer, where did they discharge and during what years?

Response: Not applicable.

c) i) Did any storm sewers, or catch basins or lagoons exist at any time at the facility and if so during what years?

Response: Texaco objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, a storm water sewer with catch basins existed at the time Texaco acquired the Terminal. The number of years it has been in service is not known. There are no known lagoons ever to have existed at the Terminal.

ii) If catch basins or lagoons existed, were they lined or unlined?

Response: To the best of Texaco's knowledge, the catch basins identified in response c) i) are believed to have been lined.

iii) What was stored in the lagoons?

Response: Not applicable.

iv) Where was the discharge from any of these structures released and during what years? Was this discharge treated before its release and if so, how and during what years? What was the chemical composition of any waste waters released?

Response: Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal,

Texaco responds that to the best of its knowledge during its ownership of the Terminal the storm water sewer received storm water runoff surrounding a canopied loading rack area. The collected storm water was directed to an oil/water separator, which discharged to the Passaic River. The effluent was tested in accordance with a New Jersey Pollution Discharge Elimination System (NJPDES) permit. Information on the composition of the effluent is not available.

d) Please supply diagrams of any waste water collection, transport or disposal systems on the property.

Response: Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope, in that nowhere is the term "property" defined. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco responds that if such documents are available they will be provided to EPA under separate cover.

7) a) For each hazardous substance, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, provide the total amount generated during the operation of the facility on an annual basis.

Response: Texaco objects to the use of the term "hazardous substances" in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it has no knowledge as to any hazardous substances being generated at the Terminal.

b) Were any hazardous substances, including, but not limited to, the substances listed in response to item (3) or identified in the responses to item (4), above, disposed of in or discharged to the Passaic River including its tributaries? If yes, identify the hazardous substances, estimate the amount of material discharged to or disposed of in the Passaic River including tributaries and the frequency which this discharge or disposal occurred. Also please include any sampling of the river which you might have done after any discharge or disposal.

Response: Texaco objects to the use of the term "hazardous substances" in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it has no knowledge as to any hazardous substances being disposed of or discharged into the Passaic River from the Terminal.

8) Please identify any leaks, spills, explosions, fires, or other incidents of accidental material discharge that occurred at the facility during which or as a result of which any

hazardous substances, including, but not limited to, the substances listed in response to item (3) and (4), were released on the property, into the waste water or storm drainage system at the facility or to the Passaic River including its tributaries. Provide any documents or information relating to these incidents, including the ultimate disposal of any contaminated materials.

Response: Texaco objects to the use of the term “hazardous substances” in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to EPA’s use of the term “facility” in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it has no knowledge as to any hazardous substances being disposed of or discharged into the Passaic River from the Terminal.

a) Please provide the results of any sampling of the soil, water, air or other media after any such incident and before and after clean-up. Please provide in this information all sampling performed for or by NJDEP or EPA.

Response: Not applicable

9) a) Was your facility ever subject to flooding? If so, was the flooding due to:

i) overflow from sanitary or storm sewer back-up, and/or

ii) flood overflow from the Passaic River?

b) Please provide the date and duration of each flood event.

Response: Texaco objects to EPA’s use of the term “facility” in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it has no knowledge of any flood event occurring at the Terminal prior to February 1985.

10) Please provide a detailed description of any civil, criminal, or administrative proceedings against your company for violations of any local, State or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport, or disposal. Provide copies of all pleadings and depositions or other testimony given in these proceedings.

Response: Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objection stated above, to the extent that EPA meant to refer to the Terminal, Texaco responds that to the best of its knowledge during its ownership of the Terminal there are no known violations reported to have occurred prior to February 1985 of any local, state

or federal laws or regulations relating to water pollution or hazardous waste generation, storage, transport, or disposal.

11) Provide a copy of each document which relates to the disposal of all hazardous substances, including, but not limited to, the substances listed in response to item (3) or (4). If you are unable to provide a copy of any document, then identify the document by describing the nature of the document (e.g. letter, file memo, invoice, inventory form, billing record, hazardous waste manifest, etc.) Describe the relevant information contained therein. Identify by name and job title the person who prepared the document. If the document is not readily available, state where it is stored, maintained or why it is unavailable.

Response: Texaco objects to the use of the term "hazardous substances" in this request, in that courts have held and EPA has made certain determinations that the petroleum exclusion contained within CERCLA would apply to many of the substances listed below if they are contained within petroleum. Further, Texaco objects to this request as being so unduly broad and of such a non-specific nature as to geographic area that it is unreasonable in its scope. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that it has no knowledge as to any hazardous substances being disposed of at the Terminal.

12) a) Did you or anyone else sample the soil, ground water, surface water, ambient air or other environmental media at the facility for the purposes other than those identified in the questions above including CERCLA, RCRA, or ECRA/ISRA.

Response: Texaco objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that Texaco has sampled soil and ground water related to ISRA Case # E84455. In addition, the current owner/operator of the facility has reportedly sampled environmental media at the facility for purposes related to NJDEP oversight.

b) If so, please provide all other documents.

Response: Copies of sample results reports related to Texaco's activities in this regard will be made available for review and copying at a mutually convenient time or may otherwise be viewed at NJDEP.

13) a) Has your company owned the facility at the location designated above? If so, from whom did your company purchase the property and in what year? If your company subsequently sold the property, to whom did your company sell it and in what year? Please provide copies of any deeds and documents of sale.

Response: Please see Response No. 1. Copies of deeds and documents of sale, to the extent they exist, will be made available under separate cover.

b) If your company did not own the facility, from whom did your company rent the facility and for what years? Please provide copies of any rental agreements.

Response: Texaco objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that this request is not applicable.

c) To what extent that you know, please provide the names of all parties who owned or operated the facility during the period from 1940 through the present. Describe the relationship, if any, of each of those parties with your company.

Response: Texaco objects to EPA's use of the term "facility" in this question without more specificity, because as that term is defined in the instructions and CERCLA it could be construed to apply to many locations within the Lower Passaic River Study Area. Without waiving its objections stated above, to the extent that EPA meant to refer to the Terminal, Texaco states that to the best of its knowledge:

- 1941 to 1951 Owner: The Atlantic Refining Company
- 1951 to 1972 Owner: Tidewater Associated Oil Company
- 1972 to 1984 Owner: Getty Oil Company (successor by merger to Tidewater Oil Company)
- 1984 to 1985 Owner: Texaco Refining and Marketing Inc. (successor by merger to Getty Oil Company)
- 1985 to Present Owner: Power Test Realty Company

14) Answer the following questions regarding your business or company. In identifying a company that no longer exists, provide all the information requested, except for the agent for service of process. If your company did business under more than one name, list each name.

a) State the legal name of your company.

Response: Texaco Inc., a Delaware corporation.

b) State the name and address of the president or the chairman of the board, or other presiding officers of your company.

Response: John Bethancourt, President, 6001 Bollinger Canyon Road, San Ramon, California 94583.

c) State the number of people employed by your company.

Response: Texaco Inc. currently has no employees.

d) Identify the state of incorporation of your company and your company's agent for service of process in the state of incorporation and in New Jersey.

Response: Texaco Inc. is incorporated in Delaware. The registered agent for Delaware is Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington,

DE 19898. The registered agent for New Jersey is Corporation Service Company, 830 Bear Tavern Road, West Trenton, New Jersey 08628, (800)927-9800.

e) Provide a copy of your company's "Certificate of Incorporation" and any amendments thereto.

Response: Those documents will be provided to EPA under separate cover.

f) If your company is a subsidiary or affiliate of another company, or has subsidiaries, or is a successor to another company, identify these related companies. For each related company, describe the relationship to your company; indicate the date and manner in which each relationship was established.

Response: Texaco Inc. is an indirect subsidiary of ChevronTexaco Corporation, by way of a merger between Keepep Inc., a wholly owned subsidiary of Chevron U.S.A. Inc., a ChevronTexaco company, and Texaco Inc. on October 9, 2001.

g) Identify any predecessor organization and the dates that such company became part of your company.

Response: See Response No. 14 f).

h) Identify any other companies which acquired by your company or merged with your company.

Response: See Response No. 14 f).

i) Identify the date of incorporation, state of incorporation, agents for service of process in the state of incorporation and New Jersey, and nature of business activity, for each company identified in the responses to items (14)(e), (f), and (g), above.

Response: Texaco objects to this request as being beyond the scope of EPA's authority under 104(e).

j) Identify all previous owners or parent companies, address(es), and the date change in ownership occurred.

Response: See Response No. 14 f). Texaco objects to this request as being beyond the scope of EPA's authority under 104(e).

15) Provide the name, address, telephone number, title, occupation of the person(s) answering this "Request for Information" and state whether such person(s) has personal knowledge of the responses. In addition, identify each person who assisted in any way in responding to the "Request for Information" and specify the question to which each person assisted in responding. Please include the names and addresses of former employees who were contacted to respond to any of the questions.

Response: Jon Baldwin, Superfund Project Manager (all questions)
Camille Russo, Legal Analyst (file searches)
B. Mark Hausman, Senior Counsel (all questions)
Ken Swider, Project Manager for Quest Environmental &
Engineering Inc. (all questions)